



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The National Bank of Indianapolis
Charter Number: 22652

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Indianapolis, IN 46204-0000

Office of the Comptroller of the Currency

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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

OVERALL CRA RATING	2
DEFINITIONS AND COMMON ABBREVIATIONS.....	3
DESCRIPTION OF INSTITUTION.....	7
SCOPE OF THE EVALUATION.....	8
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....	9
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....	10
LENDING TEST	10
INVESTMENT TEST	14
SERVICE TEST.....	14
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA	C-1

Overall CRA Rating

Institution’s CRA Rating: This institution is rated Satisfactory.

The following table indicates the performance level of The National Bank of Indianapolis (NBI) with respect to the Lending, Investment, and Service Tests:

Performance Levels	National Bank of Indianapolis Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending levels reflect satisfactory responsiveness by NBI to the credit needs of the Indianapolis, IN Metropolitan Statistical Area (MSA) Assessment Area (AA). The overall geographic and borrower distribution for home mortgage and commercial loans reflects an adequate dispersion within low- and moderate-income (LMI) geographies and to borrowers of different income levels.
- Community development lending activity was positively considered in the Indianapolis Indiana MSA. The bank’s overall responsiveness is excellent, given its size, lending capacity, and opportunities.
- Community development investments reflect adequate responsiveness given the level of opportunities in the AA. Current period investments consist of: low- income housing tax credits, investments in loan pools for small businesses and LMI housing projects, charitable contributions addressing social service needs, and grants that assist in providing affordable housing to low- and moderate-income individuals.
- NBI demonstrates adequate responsiveness to the community development needs within the AA. The bank’s delivery systems are accessible to low- and moderate-income geographies and to low- and moderate- income individuals. Bank personnel provided financial expertise through participation in a satisfactory level of community development services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

The National Bank of Indianapolis (NBI) is a large community bank headquartered in Indianapolis, IN. NBI is an intrastate institution with twelve full-service offices serving all of Marion County and portions of Hamilton County, Boone County, and Johnson County, all of which are in the Indianapolis, IN Metropolitan Statistical Area (MSA), #26900. As of September 30, 2009, NBI had \$1.127 billion in total assets. NBI opened two branches in Hamilton County in January and November 2008, and one branch in Hamilton County in December 2009. No branches were closed. The bank also operates sixteen automatic teller machines (ATMs). Twelve are full service machines located at each of the branches. The other four machines are free standing cash dispensing units.

NBI is a wholly owned subsidiary of The National Bank of Indianapolis Corporation (NBIC), a locally owned and managed corporation, also headquartered in Indianapolis, Indiana. NBIC has no other subsidiaries. NBI was founded in 1993. Since that time, the bank's focus has been to provide a high level of specialized service to professionals, executives, to businesses with annual sales of less than \$30 million, and to not-for-profit organizations located within its AA. The bank's mission has not changed since its application for a charter, and is "to acquire and maintain profitable multi-service financial relationships with the priority market segments of small/medium sized businesses, executive/professional/affluent individuals, and not-for-profit organizations in the Indianapolis marketplace." The business strategy states that "the lending strategies will focus primarily upon commercial loans to small and medium sized businesses and professionals, while including those in low- and moderate-income areas. In addition, a residential mortgage lending strategy will be directed to executive and professional customers."

NBI is a full service lender offering various loan and deposit products. In addition to their business strategy, NBI offers conventional mortgage loans, home improvement and refinance loans, and consumer loans. However, NBI does not actively market these products. As of September 30, 2009, loans represented 71 percent of total assets and consisted of commercial and commercial real estate loans (62 percent), residential real estate loans (36 percent), and consumer loans (2 percent).

There are no financial, legal or other factors, which would impede the bank's ability to meet the credit needs of the community it serves. As of September 30, 2009, NBI reported Tier 1 capital of \$85.3 million.

NBI was rated "Satisfactory" at its last CRA evaluation dated January 22, 2007.

From January 22, 2007 through December 31, 2009, the bank originated loans, as noted below.

Commercial	\$1.698 billion	4,822 loans
Residential Real Estate	\$ 353 million	3,040 loans
Consumer	\$ 457 million	4,708 loans

Source: NBI's internally generated reports

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test, including community development (CD) loans, is January 22, 2007 through December 31, 2009. The evaluation period for the Investment and Service Tests is January 22, 2007 through January 19, 2010.

Products included in NBI's lending test analysis are small loans to businesses, reportable home mortgage loans, small loans to farms, and CD loans. Loan products are weighted based on the distribution of reported loans by number (i.e. home mortgage, small business, and small farm loans).

We utilized 2008 Peer Data, the most recent data available, for home mortgage, small business, and small farms to compare NBI's lending performance to other reporting lenders in the assessment areas. We also used deposit information, reported to the Federal Deposit Insurance Corporation annually, to determine the bank's deposit market share and market presence within its assessment area. The most recent deposit information available is dated June 30, 2009.

Data Integrity

The Community Reinvestment Act requires that banks of a specific asset size collect and maintain certain data regarding originations and purchases of mortgage loans, small business loans, and small farm loans. NBI has only been required to collect and report small business and small farm data since January 1, 2008. As part of our evaluation, we conducted an independent test of the data NBI collected for home mortgage, small business, and small farm loan products to assess their accuracy. We determined the bank's 2007, 2008, and 2009 loan data to be substantially accurate and it is used without exception in this evaluation.

Selection of Areas for Full-Scope Review

NBI has only one AA consisting of all of Marion County (212 geographies), 11 geographies in Hamilton County, two geographies in Boone County, and one geography in Johnson County. All geographies are contiguous census tracts located in the Indianapolis, IN MSA, #26900. Twenty-six of the total geographies are low-income, 77 are moderate-income, 75 are middle-income, and 47 are upper-income. There is only one unknown geography in the bank's AA. A full-scope review was performed for this AA.

Ratings

The bank's overall rating is based on the bank's AA in the Indianapolis, IN MSA.

When determining conclusions for the Lending Test, mortgage loans were given more weight than small business and small farm loans. This weighting is reflective of the bank's distribution of lending volume (by number) for mortgage, small business, and small farm loans.

Inside/Outside Ratio

For the geographic distribution analysis under the Lending Test, we performed an inside/outside ratio analysis at the bank level. A substantial majority of the bank's loans by number (81 percent) are inside its assessment areas. By product type, 83 percent of home mortgage loans and 79 percent of small business loans are originated to borrowers inside the bank's assessment areas. We viewed this as a positive characteristic in our analysis of lending performance.

Lending in Assessment Areas										
Type of Loan	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
RE - Home Purchase	306	84.53%	56	15.47%	362	\$57,970	74.19%	\$20,165	25.81%	\$78,135
RE - Home Refinance	346	81.60%	78	18.40%	424	\$93,198	80.53%	\$22,534	19.47%	\$115,732
RE - Home Improvement	2	100.00%	0	0.00%	2	\$871	100.00%	\$0	0.00%	\$871
Small Business Loans	415	78.75%	112	21.25%	527	\$98,361	75.60%	\$31,743	24.40%	\$130,104
Small Farm Loans	0		0		0	0		0		0
Totals	1,069	81.29%	246	18.71%	1,315	\$250,400	77.08%	\$74,442	22.92%	\$324,842

Source: HMDA data and bank small business data for 2007, 2008, and 2009.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Indianapolis, IN MSA is adequate.

Lending Activity

The volume of lending in the Indianapolis, IN MSA is adequate. Lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. In the Indianapolis, IN MSA AA, mortgage loans account for 61 percent of total reported loans, and small loans to businesses account for 39 percent of total reported loans. Therefore, mortgage loans received the greatest weight in the analysis. Refer to Table 1, Lending Volume, in appendix C for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of NBI's home mortgage loans and loans to small businesses in low- and moderate-income geographies is adequate, given the bank's overall market share and lending strategy. Our analysis reflected lending in a majority of the census tracts in the AA.

Home Mortgage Loans

The geographic distribution of home mortgage loans in the low- and moderate-income geographies reflects an adequate distribution among the different income level geographies. Refer to Tables 2, 3, and 4 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home purchase loans is good. The geographic distribution of home purchase loans in the low-income geographies is excellent and the geographic distribution of home purchase loans in moderate-income geographies is good. The percentage of home purchase loans (7.28 percent) exceeds the percentage of owner-occupied units (4.58 percent) in the low- income geographies. The percentage of home purchase loans (17.88 percent) is close to the percentage of owner occupied units (25.30 percent) in moderate-income geographies. In addition, the bank's market share within the moderate-income geographies for home purchase loans (.83 percent) was above the bank's overall market share for home purchase loans within the MSA. The bank ranks eleventh with an overall market share of .56 percent in the Indianapolis, IN MSA AA.

The geographic distribution of home improvement loans is poor. The bank made only two home improvement loans during this evaluation period. The bank made no home improvement loans in low- or moderate-income geographies, although the percentage of owner occupied units in the bank's low-income geographies is 4.57 percent and in the moderate-income geographies 25.30 percent. NBI ranks nineteenth among financial

institutions in the Indianapolis, IN MSA AA for home improvement loans, with an overall market share of .07 percent.

The geographic distribution of home refinance loans is poor. Although NBI's market share in the low-income geographies (.95 percent) is slightly higher than the bank's overall market share, the percentage of home refinance loans (1.17 percent) is lower than the percentage of owner-occupied units (4.57 percent) in the low-income geographies. Additionally, the percentage of home refinance loans (7.62 percent) is considerably lower than the percentage of owner-occupied units (25.30 percent) in the moderate-income geographies. The bank's market share in the moderate-income geographies (.42 percent) is also lower than the bank's overall market share. The bank ranks fifth among financial institutions in the Indianapolis, IN MSA AA for refinancing, with a market share of .62 percent.

Small Loans to Businesses

The geographic distribution of small loans to businesses in low- and moderate-income geographies reflects adequate distribution among the different income-level geographies. The performance in the moderate-income geographies received more weight than the performance within the low-income geographies, as 20 percent of the businesses in the AA are located within the moderate-income geographies, compared to five percent located in the low-income geographies. Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses in low income geographies is excellent. The percent of small loans to businesses (5.06 percent) exceeds the percentage of businesses in those geographies (4.90 percent). Additionally, the bank's market share in low-income geographies (1.20 percent) exceeds the bank's overall market share (.72 percent). The geographic distribution of small loans to businesses in moderate-income geographies is poor. The percent of small loans to businesses (11.57 percent) is significantly lower than the percentage of businesses in those geographies (20.02 percent). The bank's market share in moderate-income geographies (.56 percent) is also lower than the overall market share (.72 percent.) The bank ranks twentieth in overall market share for small loans to businesses, within the Indianapolis, IN MSA AA.

Small Loans to Farms

The geographic distribution of small loans to farms in low- and moderate-income geographies is not meaningful, as the bank does not offer farm loans. Refer to Table 7 in appendix C for demographic data about farms in the AA.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps in low- and moderate-income areas. We did not identify any conspicuous lending gaps in the Indianapolis, IN MSA AA.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution by income level of the borrower for home mortgage loans, small business, and small farm loans is adequate, given the poverty rate of families (8 percent) and the bank's business strategy. Home mortgage loans were weighted heavier than business loans, as there was a higher volume of loans to analyze. In addition, affordable housing was identified as a credit need in the AA.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is adequate. Refer to Tables 8, 9, and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution for home purchase loans is excellent. The percentage of loans made to low-income borrowers (20.13 percent) is close to the percentage of families in the AA (21.30 percent). Additionally, the market share for loans made to low-income borrowers (1.72 percent) exceeds the overall market share (.66 percent). The percentage of loans made to moderate-income borrowers (32.21 percent) exceeds the percentage of moderate-income families (18.98 percent) in the AA and is excellent, although the market share for loans made to moderate-income borrowers (.42 percent) is lower than the overall market share (.66 percent). The bank ranks eleventh in the overall market share for home purchase loans, as compared to other financial institutions in the Indianapolis, IN MSA AA.

The borrower distribution for home improvement loans is poor. Although the bank made two home improvement loans during the evaluation period, neither of the loans were made to low- or moderate-income borrowers, even though 21.30 percent of families in the AA are low-income, and 18.98 percent of the families in the AA are moderate income. The bank ranks nineteenth in market share for home improvement loans, with .08 percent of the overall market share, as compared to other financial institutions in the Indianapolis, IN MSA AA.

The borrower distribution for home refinance loans is poor. The percentage of loans made to low- and moderate-income borrowers (1.79 percent and 8.93 percent) is lower than the percentage of low- and moderate-income families in the AA (21.30 percent and 18.98 percent). Additionally, NBI's percentage of market share in low- and moderate-income geographies is less than the bank's overall market share. The bank ranks fifth in market share for home improvement loans, with .62 percent, as compared to other financial institutions in the Indianapolis, IN MSA AA.

Small Loans to Businesses

The borrower distribution of small loans to businesses is adequate. Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The percent of loans to businesses with revenues of \$1 million or less (42.41 percent) is lower than the percentage of businesses with revenues of \$1 million or less (72.46 percent) in the Indianapolis, IN MSA AA. However, NBI's market share to businesses with revenues of \$1 million or less (1.22 percent) is greater than the overall market share (.72 percent). The bank ranks twentieth in overall market share for small loans to businesses.

Small Loans to Farms

The borrower distribution of small loans to farms is not meaningful, as the bank does not offer farm loans. Refer to Table 12 in appendix C for demographic data about farms in the AA.

Community Development Lending

Community development lending had a positive effect on the Lending Test conclusions. Refer to Table 1, Lending Volume, in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multi-family loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Community development lending in the Indianapolis, IN MSA is excellent, given the volume of loans and responsiveness to the area's identified credit needs of affordable housing and revitalization efforts. Community development lending had a positive impact on the bank's overall lending performance. The bank originated 15 community development loans totaling \$11.1 million, or 13 percent of Tier 1 capital, during the evaluation period. This included five individual loans totaling approximately \$2.6 million to Partners in Housing to provide permanent financing for multi-family housing and/or financing for renovations to existing properties. The organization specializes in providing affordable rental units for the homeless, low-income, and special needs individuals. NBI also made a \$2.5 million loan to Schoolhouse Finance LLC to purchase a run down building in a moderate-income geography that was designated by the mayor of Indianapolis as a redevelopment area. The building will be converted into a charter school, of which 51 percent of the students come from low-income families. Additionally, the bank provided permanent financing of \$2.5 million to Charter Schools Development Corporation for the same purpose. NBI also provided three loans totaling \$1.7 million to Hoosiers Veterans Assistance Foundation. This organization provides services to homeless or at risk Indiana Veterans, including counseling, training, and food and shelter. An additional \$1 million was provided to Platinum-Diamond Properties, LLC to purchase and renovate an apartment complex in a moderate-income geography that will be primarily accommodated by low- and moderate-income individuals/families.

Product Innovation and Flexibility

The bank offers various home mortgage loan programs with flexible features to help meet the needs of the assessment area. These include First Step 7/1 ARM and 30 year fixed rate mortgage. This program was introduced to help meet the specific needs of low- and moderate-income individuals seeking mortgage financing. The program includes 100 percent financing with no private mortgage insurance required, more relaxed credit standards, higher housing and debt ratios comparable to FHA standards, and no reserve requirements. The loans are restricted to low- and moderate- income borrowers who complete an approved home ownership counseling program. Additionally, NBI has partnered with the Federal Home Loan Bank for down payment assistance in the form of a forgivable grant. The bank will match the household's contribution up to three times their contribution with a cap of \$5,000 to be used for down payment or closing costs. The number and dollar amount of loans originated under these programs is included in the totals for home mortgage loans.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated Low Satisfactory, based on a full-scope review of the bank's performance in the Indianapolis, IN MSA. Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

The number and dollar volume of NBI's qualified investments are adequate based on the opportunities to make investments in the Indianapolis, IN MSA and identified assessment area needs (affordable housing for low- and moderate-income individuals and affordable mortgage programs). The bank provided fourteen qualified investments totaling approximately \$1.2 million, or 1.5 percent of Tier 1 capital, during the evaluation period. The bank's qualified investments consist of funds to be used for small business lending to low- and moderate-income individuals, funds to purchase low-income housing tax credits, grants for first-time homebuyer programs, grants for affordable housing programs, and grants for shelter and healthcare for the homeless. Various charitable contributions were also made to supply food, shelter, and clothing to low- and moderate-income individuals and the homeless, and to provide educational opportunities and rehabilitation services for homeless and at-risk children.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated Low Satisfactory, based on a full-scope review of the bank's performance in the Indianapolis, IN MSA.

Retail Banking Services

Accessibility to the bank's delivery systems in the AA is considered adequate. NBI's delivery systems are accessible to geographies and individuals of different income levels throughout the AA. The level of community development services provided by bank staff is satisfactory. Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The Indianapolis, IN MSA AA has twenty-six low-income geographies and seventy-seven moderate-income geographies. There are no NBI offices in these low- or moderate-income geographies, although approximately 38 percent of the population resides in these geographies. However, there are offices near these geographies that are accessible to the low- and moderate-income population. Nine of the twelve branches are located within five miles of the low- and moderate-income geographies, and one branch is located in an upper-income geography that is contiguous with a moderate-income geography. Additionally, full-service ATMs are disbursed throughout the assessment area, including one in a low-income geography. NBI also offers alternative delivery systems that are available to all customers and can help facilitate availability to all geographies and income levels in its AA. These include access to banking services provided through 24-hour, seven days a week internet banking and telephone banking options. NetTeller and Bank by Phone allow the customer free access to most of the routine services the bank offers, including obtaining account balances, transferring

funds between accounts, and verifying if checks have cleared. Bill payment is also available at a nominal cost. Additional delivery services include direct deposit, courier pick up, remote deposit capture, debit cards, and banking by mail.

NBI has not closed any branches in the assessment area during the evaluation period; however, two branches were opened in 2008 and one branch was opened in 2009. All three branches are located in upper-income census tracts in Hamilton County.

There is no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its assessment area, particularly the low- and moderate-income geographies or low- to moderate-income individuals. Drive-up facilities offer extended hours on Friday and Saturday, and ATMs offer 24-hour service.

The bank does not monitor the use of their alternative delivery systems by low- and moderate-income individuals. As a result, we did not place significant weight on these systems to reach conclusions on NBI's performance under the Service Test.

Community Development Services

NBI's performance in providing Community Development (CD) services to its AA is satisfactory. Fourteen bank employees provided their financial expertise to 15 organizations that promote community development initiatives in the assessment area. This includes affordable housing programs for low- and moderate-income individuals and families, services targeted to low- and moderate income individuals, and programs that assist in revitalizing and stabilizing the assessment area. Employees provided financial assistance through fundraising, budget preparation and evaluation, grant assistance, and investment advice. Others served as members of loan and finance committees, or spoke/instructed to improve financial literacy among low- and moderate-income individuals. Major highlights of CD service activities in the AA during the evaluation period include the following:

NBI teamed with Partners in Housing in applying for two Federal Home Loan Affordable Housing Program grants (\$665,200 and \$550,000). This organization provides housing for the homeless by taking old dilapidated buildings, and through grants turns them into affordable housing units. Rental subsidies are provided to two-thirds of the housing units.

NBI partnered with the Business Ownership Initiative (BOI) and taught classes on small business development. BOI is a non-profit agency that helps individuals create and develop their own small business. The majority of participants in the program are African/American females with median household incomes of \$22,000.

NBI staff provided financial expertise to Crooked Creek CDC. Crooked Creek is recognized as an innovator in affordable housing and community development. The CDC partners with government and nonprofit organizations to rehabilitate vacant single family dwellings into safe, clean, service-rich housing for vulnerable populations, attracts resources to build affordable housing for low-income residents, works with community partners to repair homes for the low-income and elderly, preserves historic structures, and spearheads revitalization efforts.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (including Community Development Loans): January 22, 2007 to December 31, 2009 Investment and Service Tests: January 22, 2007 to January 19, 2010	
Financial Institution	Products Reviewed	
National Bank of Indianapolis, Indianapolis, IN	Home Mortgage, Small Business, Small Farm, and Community Development Loan Data; Qualified Investments; Retail and Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	NA	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Indianapolis IN MSA AA	Full - Scope	

Appendix B: Market Profiles for Full-Scope Areas

[Complete a market profile for each MA or nonmetropolitan area that received a full-scope review.]

(Indianapolis IN MSA)

Demographic Information for Full-Scope Area: (Indianapolis, IN MSA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	227	11.45	33.92	33.04	21.15	0.44
Population by Geography	995,181	7.10	30.66	33.80	28.45	0.00
Owner-Occupied Housing by Geography	248,679	4.57	25.30	35.35	34.77	0.00
Businesses by Geography	95,630	4.90	20.02	38.68	36.27	0.13
Farms by Geography	1,439	2.50	18.21	34.26	45.03	0.00
Family Distribution by Income Level	252,397	21.30	18.98	21.80	37.92	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	101,670	12.15	45.58	29.90	12.37	0.00
Median Family Income	\$55,425					
HUD Adjusted Median Family Income for 2009	\$68,100					
Households Below the Poverty Level	10.00%					
			Median Housing Value		\$108,869	
			Unemployment Rate		8.50%	
			(December 2009)			

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 U.S. Census, and 2009 HUD updated MFI.

NBI operates 12 branches and 16 ATMs within the bank's Indianapolis, IN MSA AA. The Indianapolis, IN MSA AA includes all census tracts in Marion County, IN, 12 census tracts in Hamilton County, IN, two census tracts in Boone County, IN, and one census tract in Johnson County, IN. These census tracts are contiguous. The assessment area complies with the regulation and does not arbitrarily exclude any LMI areas.

NBI ranks seventh in deposit market share among sixty-three financial institutions operating in its Indianapolis, IN MSA AA. These financial institutions consist of large regional banks, large local banks, and small community banks. Credit unions and other financial service providers provide additional competition in the AA.

As of June 30, 2009, NBI's deposits totaled \$897 million and represented approximately 3.87 percent of the market. Major competitors include: JP Morgan Chase Bank with 29.18 percent of the market; National City Bank with 15.88 percent of the market; Fifth Third Bank with 7.93 percent of the market; Huntington National Bank with 6.42 percent of the market

Economic indicators show the Indianapolis economy has slowed since 2007. The 2007 yearly average unemployment rate for the Indianapolis, IN MSA was 4.1 percent and increased to 6.7

percent as of December 2008. The December 2009 unemployment rate was 8.5 percent. This unemployment rate is lower than the December 2009 national rate of 9.7 percent and the state rate of 9.8 percent. Indianapolis home sales decreased 19.7 percent in 2007 and 24 percent in 2008 over the prior year.

Non-classified establishments, services, retail trade, and finance, insurance, and real estate are the major employment industries in the assessment area. The total number of businesses located within the AA is 84,650. Small businesses (gross annual revenues of less than \$1 million) make up 63 percent of the businesses in the AA. Some of the major employers in the AA include: State and local government, Clarion Health, Indiana University, Purdue University of Indianapolis, and Eli Lilly.

Numerous opportunities exist in the AA for the bank to participate in community development, affordable housing, and outreach programs. Based on interviews performed during this evaluation period with a local housing development corporation and a local community development corporation (both provide affordable housing to low- and moderate-income individuals/families), we noted that affordable housing, grant funding for housing rehabilitation, innovative community development programs, and more affordable alternative mortgage products are needed in the assessment area.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: INDIANAPOLIS IN MSA AA						Evaluation Period: January 22, 2007 – December 31, 2009				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
	654	654	152,039	415	98,361	0	0	15	11,136	1084	261,536	3.87

* Loan Data as of December 31, 2009. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is January 22, 2007 – December 31, 2009

*** Deposit Data as of January 19, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: INDIANAPOLIS IN MSA AA						Evaluation Period: January 22, 2007 – December 31, 2009							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	302	100.00	4.57	7.28	25.30	17.88	35.35	27.15	34.77	47.68	.56	4.16	.83	.33	.49

* Based on 2008 Peer Mortgage Data: Eastern Region.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: INDIANAPOLIS IN MSA AA								Evaluation Period: January 22, 2007 – December 31, 2009					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	2	100.0	4.57	0.00	25.30	0.00	35.35	100.00	34.77	0.00	.07	.00	.00	.21	.00

* Based on [2008 Peer Mortgage Data: Eastern Region.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANAPOLIS IN MSA AA								Evaluation Period: January 22, 2007 – December 31, 2009				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	341	100.0	4.57	1.17	25.30	7.62	35.35	19.94	34.77	71.26	.62	.95	.42	.48	.75

* Based on 2008 Peer Mortgage Data: Eastern Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: INDIANAPOLIS IN MSA AA								Evaluation Period: January 22, 2007 – December 31, 2009					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	9	100.0	7.87	33.33	35.27	22.22	43.04	44.44	13.82	0.00	4.55	0.00	3.85	6.52	0.00

* Based on 2008 Peer Mortgage Data: Eastern Region.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: INDIANAPOLIS IN MSA AA					Evaluation Period: January 22, 2007 – December 31, 2009				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography										
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp				
Full Review:																					
Indianapolis MSA	415	100.0	4.90	5.06	20.02	11.57	38.68	40.72	36.27	42.65	.72	1.20	.56	.76	.75						

* Based on [2008 Peer Small Business Data: US and PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet 2009

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: INDIANAPOLIS IN MSA AA					Evaluation Period: January 22, 2007 – December 31, 2009				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Indianapolis MSA	0	0.00	2.50	0.00	18.21	0.00	34.26	0.00	45.03	0.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2008 Peer Small Business Data: US and PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet 2009

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: INDIANAPOLIS IN MSA AA						Evaluation Period: January 22, 2007 – December 31, 2009							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	302	100.0	21.30	20.13	18.98	32.21	21.80	6.04	37.92	41.61	.66	1.72	.43	.19	.79

* Based on [2008 Peer Mortgage Data: Eastern Region.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.30% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: INDIANAPOLIS IN MSA AA						Evaluation Period: January 22, 2007 – December 31, 2009							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families ***	% BANK****	% Families ***	% BANK****	% Families ***	% BANK****	% Families ***	% BANK****	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	2	100.0	21.30	0.00	18.98	0.00	21.80	0.00	37.92	100.00	.08	0.00	0.00	0.00	.21

* Based on 2008 Peer Mortgage Data: Eastern Region.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: INDIANAPOLIS IN MSA AA						Evaluation Period: January 22, 2007 – December 31, 2009							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	341	100.0	21.30	1.79	18.98	8.93	21.80	8.04	37.92	81.25	.75	0.00	.21	.22	1.41

* Based on 2008 Peer Mortgage Data: Eastern Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: INDIANAPOLIS IN MSA AA			Evaluation Period: January 22, 2007 – December 31, 2009	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Indianapolis MSA	415	100.0	72.46	42.41	45.30	24.10	30.60	.72	1.22

* Based on 2008 Peer Small Business Data: US and PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B – 2009).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 14.70% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: INDIANAPOLIS IN MSA AA		Evaluation Period: January 22, 2007 – December 31, 2009			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Indianapolis MSA	0	0.00	96.94	0.00	0.00	0.00	0.00	0.00	0.00

* Based on [2008 Peer Small Business Data: US and PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2009).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: INDIANAPOLIS IN MSA AA				Evaluation Period: January 22, 2007 – January 19, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Indianapolis MSA			14	1,242	14	1,242	100.00		

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: INDIANAPOLIS IN MSA AA Period: January 22, 2007 – January 29, 2010																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Indianapolis MSA	100	12	100	0.00	0.00	33.0	67.0	3	0				+3	7.10	30.66	33.80	28.45